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March 29, 2022

Via ECF

Hon. Sarah L. Cave
United States Magistrate Judge
United States District Court-SDNY
500 Pearl Street, Courtroom 18A
New York, NY 10007

Re: Sydney Hyman v. Andrew Fabbri and Jessica Cohen
Case No. 19-civ. 10506 (AT)(SLC)

Dear Judge Cave:

As Your Honor may recall, Harrington, Ocko & Monk LLP ("HOM") represents Plaintiff Sydney Hyman ("Plaintiff" or "Hyman") in the above-referenced matter. We submit this joint letter with Michael Murad Khan, Esq., counsel for the Defendant, Andrew Fabbri ("Defendant" or "Fabbri"), to advise the Court that the remaining deposition of one of the Plaintiff's expert witnesses, Danielle Joy Healey, Esq. ("Attorney Healey"), was unable to be conducted on March 25, 2022, as scheduled. We apologize for the delay in filing this joint letter.

The deposition was cancelled minutes before it was to commence due to the unfortunate passing of the Court Reporter's husband, which she just learned about. Efforts were made by Counsel to obtain another Court Reporter last minute, but they proved unsuccessful. The earliest available date for Counsel and the Expert to complete such deposition is April 7, 2022, which date the Parties have confirmed.

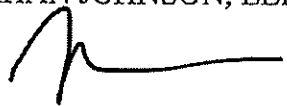
The Parties respectfully request that the Court grant permission to extend the time within which to complete Attorney Healey's deposition until April 7, 2022.

Thank you for Your Honor's potential consideration to this matter

HARRINGTON, OCKO & MONK, LLP


By: Michael W. Freudenberg, Esq.

KHAN JOHNSON, LLP


By: Murad Michael Khan, Esq.